Best Practice Management of Change and Pre-Startup Safety Review for the Chemical Process Industry

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Abstract

Management of Change (MOC) and Pre Start-up Safety Review (PSSR) are still the most challenging elements of OSHA’s Process Safety Management (PSM) standard, the EPA’s Risk Management Program (RMP) rule, and now, the US Department of Interior’s Bureau of Safety and Environmental Enforcement’s Safety and Environmental Management Systems (SEMS). Even though the PSM standard has been around since 1992 and the industry has been managing change for several decades, we still can get it wrong, sometimes with disastrous results. The mindful or diligent efforts of many working in concert are necessary to ensure that change is identified, analyzed and executed in a quality way. Just when we get it right on paper and get the workforce up-to-speed, we have employee turnover, neglect and sometimes regulatory change. New actors and a constantly changing script make it hard to manage change efficiently and effectively. This paper discusses how the chemical process industry has defined the MOC and PSSR best management practices and how they should be automated.